

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

JIA SHENG,

Plaintiff,

v.

M&T BANK CORPORATION, and
MANUFACTURERS & TRADERS TRUST
COMPANY, d/b/a M&T BANK,

Defendants.

No. 12 Civ. 01103 (HBS)

**DECLARATION OF GEORGE D. VALLAS IN FURTHER SUPPORT OF
PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE CERTAIN EVIDENCE AT TRIAL**

George D. Vallas, of full age, being duly sworn according to law, deposes and says:

1. I am an attorney of the Ottinger Firm, P.C., attorneys for Plaintiff Jia Sheng in the above entitled action against Defendants M&T Bank Corporation and Manufacturers and Traders Trust Company d/b/a M&T Bank (collectively "Defendants" or "M&T").

2. I make this declaration in further support of Plaintiff's Motion in Limine to Exclude Certain Evidence at Trial and pursuant to the Court's Order, dated October 14, 2014 (ECF # 68).

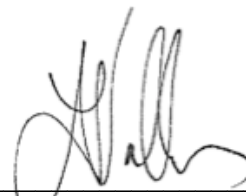
3. Attached hereto as "**Exhibit A**" is a true and correct copy of pages from the transcript of the proceedings before the Honorable Hugh B. Scott, dated October 14, 2014.

4. Attached hereto as "**Exhibit B**" is a true and correct copy of pages from the transcript of the deposition of Plaintiff Jia Sheng, dated November 2, 2013.

5. Attached hereto as "**Exhibit C**" is a true and correct copy of a document dated September 18, 2012, bearing the Bates numbers M&T000607-13, produced by Defendants in the course of this litigation.

6. I hereby declare under penalty of perjury that the foregoing statements made by me are true and based on my personal knowledge.

DATED: October 17, 2014
New York, New York

A handwritten signature in black ink, appearing to read 'G. D. Vallas', is positioned above a horizontal line.

GEORGE D. VALLAS